

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE: § CASE NO. 22-30500-swe7  
DENNIS JAMES ROGERS II, §  
Debtor. § CHAPTER 7

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AREYA HOLDER AURZADA, §  
CHAPTER 7 TRUSTEE FOR THE §  
BANKRUPTCY ESTATE OF §  
DENNIS JAMES ROGERS II §  
Plaintiff, §  
§  
v. § Adversary No. 24-03028  
§  
FUNDERZ.NET, LLC, §  
Defendant. §

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PLAINTIFF AREYA HOLDER AURZADA, CHAPTER 7 TRUSTEE FOR THE  
BANKRUPTCY ESTATE OF DENNIS JAMES ROGERS II'S MOTION TO COMPEL  
RESPONSE TO FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO  
DEFENDANT FUNDERZ.NET, LLC

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TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Plaintiff Areya Holder Aurzada, Chapter 7 Trustee for the Bankruptcy Estate of Dennis James Rogers II ("Plaintiff"), pursuant to Federal Rules of Civil Procedure 37 as applicable to this adversary proceeding, hereby files this Motion to Compel Response to First Request for Production of Documents upon Defendant Funderz.net, LLC ("Funderz") and would show the Court as follows:

Plaintiff served its First Request for Production of Documents upon Defendant Funderz.net, LLC on July 1, 2025. A true and correct copy of the First Request for Production of Documents along with the cover letter to counsel for Funderz is attached as Exhibit A.

Funderz did not respond or object and the time for any response or objection has passed.

Counsel for Plaintiff has communicated with counsel for Funderz regarding the Request for Production as well as requests for deposition dates.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that this court enter an Order that objections, if any, have been waived and further ordering Funderz to produce all responsive documents, electronically and in native format when applicable, to the office of the undersigned counsel, without objection, within seven (7) days of the entry of an Order, that Plaintiff be awarded reasonable attorney fees and expenses for bringing this Motion, and for such other and further relief to which Plaintiff may be entitled.

Dated: August 14, 2025

Respectfully submitted,

By: /s/ David B. Miller  
David B. Miller  
Texas Bar No. 00788057  
SCHNEIDER MILLER REYNOLDS, P.C.  
300 N. Coit Road, Suite 1125  
Richardson, Texas 75080  
Telephone: (972) 479-1112  
Facsimile: (972) 479-1113  
and  
T. Micah Dortch  
Texas Bar No. 24044981  
Dortch Lindstrom Livingston Law Group  
2613 Dallas Parkway, Suite 220  
Plano, TX 75093  
Telephone: 214-252-8258  
Facsimile: 888-653-3299

*Special Counsel for the Trustee*

**CERTIFICATE OF CONFERENCE**

I spoke to Turner Falk, counsel for Funderz, on at least two occasions regarding this Motion. Mr. Falk stated that his firm may be withdrawing from representation. I emailed Mr. Falk asking whether he could agree to this Motion and he has not responded as of this date. I presume that this Motion is opposed.

/s/ David B. Miller  
David B. Miller

**CERTIFICATE OF SERVICE**

I certify that on August 14, 2025, I caused a copy of the foregoing document to be served via electronic mail to the counsel listed below:

Funderz.Net, LLC  
c/o Carmen Contreras-Martinez  
SAUL EWING LLP  
701 Brickell Avenue, Suite 1700  
Miami, FL 33131  
[carmen.contreras-martinez@saul.com](mailto:carmen.contreras-martinez@saul.com)  
-and-  
Turner N. Falk  
SAUL EWING LLP  
Centre Square West  
1500 Market Street, 38th Floor  
Philadelphia, PA 19102-2186  
[turner.falk@saul.com](mailto:turner.falk@saul.com)

*Counsel to Funderz.Net, LLC*

/s/ David B. Miller  
David B. Miller